

*Comment #	Comment	Resource & Category [†]	Response to Comment
1-1	First of all, this is not an appropriate location to develop for this use. I have personally used the Panther hot springs for going on 20 years, and know it well. It is a unique area for recreationists. I have soaked in the old pool before the mud slide event, and I have sweated in the sweat lodge on many occasions, going back to 1994. This area is known and loved by generations of Idahoans. To set aside 9 square miles and this unique resource, to develop it and then remove it from the areas that the average person can enjoy would be a real loss.	Recreation 6	The Forest Service will recommend lease stipulations that reserve the right of the public to utilize the thermal pools and associated features.
1-2	It also is an important area culturally to the native Idahoans, as it has been used literally for thousands of years. I don't believe you have done your groundwork with the tribe. They prevented some cement being used to develop the hot springs along the middle fork of the payette river (above Crouch) a few summers ago. In that circumstance, the springs would not have been taken out of public use or had any kind of significant development, and they protested the development under "spiritual importance." This project would destroy the source of the hot spring and create a 9 square mile area that would be off limits to the public. This would be a much more serious mis-use of the resource, and I am wondering what the tribe has to say about your proposal.	Tribal Concern 6	The Forest Service has actively engaged the Tribes and the Tribes have provided extensive input on the project.
1-3	I am also upset by the idea of doing a non-competitive lease. Why would that even be considered? I hear so much about the federal deficit and the freeloaders on food stamps. If a company thinks they can make money off of a federal resource, and this resource is going to be taken away from the people that have been enjoying it, it should be at a high cost lease, not a non-competitive lease.	Minerals 3	The lease applications were filed under non-competitive rules; therefore, the Forest Service has no discretion regarding this aspect of the project.

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1-4	In conclusion, there are a number of equally scalding geothermal areas located in the central oregon desert that are on both public and private lands that would be much more appropriate for this kind of project. This proposal would be both a waste of our public lands and public funds.	General 2	The SCNF is required by statute to respond to BLM's request for concurrence on the leases. It has no authority to direct the applicant elsewhere.
2-1	It seems to me that Panther Hot Springs is an impractical prospect for a commercial or industrial lease of any kind. It's remote, and the country is extremely rugged and steeper than a cat's face. I believe it's far from any existing heavy-duty power line, substation, or any other such necessary infrastructure; and it's far from any significant number of potential customers for any power that may be produced. The hot spring is high above the creek, some 4 miles up the creek from the river -- via a narrow road -- and then another ~4 miles up a VERY steep and narrow one-way road to the hot spring itself. Panther Creek Hot Springs is typical of just about all the hot springs sites I know of in Central Idaho. Although there are quite a few (relatively) hot springs in and around the batholith, almost all are either in the Sawtooth NRA -- and I assume (hope) off limits to such development -- or in as rugged and remote settings as Panther Creek, and therefore impractical for such commercial or industrial development, for the reasons stated above.	Minerals 2, 6	It will be up to the applicant to determine whether the project is practical given the lease stipulations and power markets. The steepness of the terrain and limited vehicle access are among the resource concerns to be addressed in the lease stipulations. The powergrid issues will be considered in the reasonably foreseeable development scenario?
2-2	Furthermore, while I don't pretend to have any expertise on the subject, I question if ANY of these hot springs have either the water volume or high enough temperatures to be viable for such uses.	Minerals 5	The site was specifically identified as having the potential to generate electrical power in the Programmatic EIS for Geothermal Leasing in the Western U.S. by completed BLM in 2008.

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2-3	In addition to the impracticalities of commercial/ industrial development of these resources, more important, in my mind, are the educational and recreational opportunities that would be lost by any such development.	Recreation 6	Lease stipulations require protection of the surficial thermal features and public access to them.
2-4	As a former forest service employee and the spouse of a FS retiree, I know that commercial development almost always takes precedence over preservation or recreation use, so I expect that if Panther -- or any other -- Hot Spring is proposed for destruction by commercial tapping, that the Forest Service and BLM will bend over backward to accommodate it; so the best we could hope for is some -- probably minimal -- efforts at mitigation.	General 1, 6	As noted, the USFS will exercise its authority to recommend stipulations designed to protect surface resources be placed on the leases.
2-5	AS A BARE MINIMUM, (1) stipulations that any drilling, tapping, and infrastructure development and construction must be COMPLETELY out of sight and out of hearing range of the existing spring(s); and (2) before development takes place, studies must be made to insure that neither the water volume nor temperature are adversely affected by the development; (3) that those studies and tests be peer reviewed by an independent third party; and (4) if it's found that the water temperature, volume or other water qualities would be adversely impacted, the permit/lease would be cancelled, and (5) all access roads, drill pads and holes, and other related disturbances would be restored to their original grade and (6) revegetated with appropriate native vegetation, similar to what was in place before disturbance.	All Resources 6	Lease stipulations, tiered to Forest Plan standards and other applicable laws and regulations, are being developed to address each of the concerns enumerated. Standard lease terms required by BLM include provision for termination of lease for noncompliance with provisions of lease, including stipulations.

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3-1	In terms of priorities, the BLM and USFS should first site exploration activities, facilities and infrastructure to avoid impacts to wildlife and cultural resources. For instance, industrial infrastructure would not be appropriate within Wild and Scenic River corridors such as the main Salmon River. If impacts cannot be entirely avoided, the agencies should incorporate design features to minimize impacts. Lastly, the agencies should mitigate for impacts that cannot be avoided or minimized.	General 3, 6	Stipulations that restrict siting of geothermal developments or are otherwise protective of surface resources, including wildlife and cultural resources, will be included in the Forest's consent to lease. BLM rejected the portions of the lease applications within the Salmon River W&S corridor. Mitigation measures, tiered to the lease stipulations, are developed upon receipt of exploration and development plans and are required prior to issuance of any permits for such operations.
3-2	Portions of the potential project area contain important habitat for species such as salmon, steelhead, and other anadromous fish. Such habitat has been severely fragmented and reduced through a variety of management practices. The project should minimize negative impacts by avoiding areas of critical habitat for species of concern, establishing siting criteria to minimize soil disturbance and erosion on steep slopes, utilizing visual resource management guidelines, avoiding significant historic and cultural resource sites, and mitigating conflicts with other uses of the public lands.	General 3, 6	Compliance with the Endangered Species Act (ESA), the Archaeological Resource Protection Act (ARPA) and other historic and cultural preservation statutes, the PACFISH amendment to the Forest Plan, and other applicable laws, regulations and policy will be included as stipulations and/or lease notices. Some stipulations may require mitigation measures to be determined upon receipt of plans for exploration or development.

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3-3	We appreciate seasonal restrictions to avoid disturbing certain wildlife species and suggest that these restrictions may need to be expanded to offer adequate protection. New construction and infrastructure could also change crucial habitat for these species and may inhibit the ability of these species to survive. The project should avoid construction in any designated areas or lands for special management of these species.	Wildlife 6	The Forest Service worked with the Idaho Department of Fish & Game and consulted with the federal Services to develop stipulations that will guide the protection of species & habitat, should exploration, development and utilization occur.
3-4	One of the greatest concerns we have is the construction of new roads. Previous management activities have resulted in extensive road and right-of-way densities throughout our public lands. This density compromises the ability to support wildlife and fish by promoting further human disturbance, fragmenting habitat, accelerating sedimentation, spreading noxious weeds, and encouraging Off Road Vehicle use. Furthermore, there is a positive correlation between roads, even temporary ones, and human-caused wildfire ignitions.	General 6	Stipulations will be included to minimize the potential for these and other detrimental effects on surface resources. This potential and the effects of stipulations to minimize such will be disclosed in the analysis.

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3-5	New roads for construction and maintenance of geothermal development will provide more access for motorized recreation in areas without a current road system and more opportunities for illegal off-road riding. The devastating impacts of Off Road Vehicles (ORVs) on terrestrial ecosystems are well established. Irresponsible ORV users degrade water quality, spread noxious weeds, fragment habitat, disturb wildlife, increase fires, and displace non-motorized recreationists. The agencies need to analyze the impacts of ORV use accompanying new geothermal development, and describe the ability for the agencies to monitor and control ORV use as permitted by land management agencies.	Transportation 6	The lease will not authorize any motorized uses. The lessee will be notified of their responsibility to ensure proper use, closure and reclamation of any constructed routes.
3-6	We recommend that the agencies evaluate the road and transmission network to avoid impacts to wildlife habitat where feasible, and close or decommission unneeded roads and corridors as an integral part of the project.	Wildlife 2? 6?	Since the project does not include any disturbance of surface resources and can only evaluate a generic development scenario, the Forest cannot predict where impacts may occur. Because stipulations to protect habitat are required, the Forest will have the opportunity to recommend (or require, in the case of off-lease appurtenances) reasonable mitigations for any proposed infrastructure.

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3-7	The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from activities that spread noxious weeds directly or create suitable habitat by removing native vegetation and disturbing the soil. Project activities should limit road use and the exposure of mineral soils where weeds may become established. Roads, trails, and rivers serve as the primary routes for noxious weed species expansion. Special care should be taken to safeguard ecologically intact areas that are not currently infested. The agencies need to analyze the effects of noxious weeds in newly developed areas and transmission corridors and describe project management of weeds in these areas. For example, management strategies may include ensuring the tires and undercarriage of access vehicles are hosed down prior to site access to dislodge noxious weeds. The agencies should also analyze the effects of regular weed control activities in previously undisturbed areas. For example, weed treatments may affect non-target species and vehicle access may increase fire hazard and soil disturbance.	Weeds 6	The Forest Service will stipulate the lease be subject to USFS standards for weed prevention, which include the strategies described by the commenter (FSM 2080: Weed Prevention Best Management Practices).

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3-8	<p>We are concerned that construction of new geothermal development could adversely impact water quality through increased sedimentation. We are also concerned that water discharges associated with operation of certain types of geothermal development could degrade ground or surface water quality. The operator must comply with all applicable federal and state water quality laws and regulations, including sections 303, 401, and 404 of the Clean Water Act. Even though chemical use may be limited, we are still concerned about the use of fuels, lubricants, solvents, and other toxic chemicals being transported along streams, intermittent streams and drainages. The use of these hazardous materials must be carefully evaluated and all fuel storage should be greater than 300' from live water. Spill clean up materials, fire-fighting equipment, and a spill response plan must be kept in all vehicles. An oil-absorbent boom should be strategically placed so it can be quickly deployed in the event of a transportation accident. Heavy equipment should be inspected for oil and hydraulic fuel leaks prior to operation and during operations.</p>	<p>Watershed Fisheries 6</p>	<p>Lease stipulations, tiered to the Forest Plan standards and other applicable laws, regulations, statutes and rules as provided by the relevant state agencies, are being developed to address the concerns enumerated, including PACFISH/INFISH guidance. Standard lease terms will hold the lessee accountable to comply with applicable federal and state laws, regulations, BMPs, licensing and permitting.</p>

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3-9	Wildlife habitat fragmentation is a potential issue with this project. To further fragment habitat could be devastating for several species and is not necessary. We suggest planning development to use existing corridors and development as much as possible, as this will result in less fragmentation and overall impact. Commercial production of geothermal energy will require transmission lines to bring the energy onto the grid. NEPA requires the analysis of reasonable foreseeable future actions. The agencies need to analyze the effects of additional power lines joining any proposed sites to the nearest transmission.	Wildlife 2? 6	The project is being completed for leasing only. Stipulations will be required for lease issuance. Other actions that would actually disturb surface resources such as wildlife habitat would be subject to additional analysis and mitigations, if necessary to protect those resources.
3-10	The agencies must consider the potential for increased risk of human-caused fire during exploration activities, as well as during construction and maintenance, and the potential impacts to vegetation types. We also recommend developing an evacuation plan and identifying potential safe zones during construction in the event of a wildfire.	Vegetation 2? 6?	Lease stipulations were developed to address the potential for human-caused fires. Site-specific designs for evacuations and safety zones cannot be developed prior to receipt of plans for ground-disturbing operations.
3-11	The agencies should make regular site visits to ensure compliance with mitigation measures and should also engage in spot inspections without prior notification.	General 2	The lease will not authorize any actions to be monitored. However, it would be standard procedure to conduct inspections should any ground-disturbances be authorized under future analyses.
3-12	Because not all environmental impacts can be adequately avoided or minimized, environmental mitigation will be necessary. We believe that there are some potential off-site mitigation options for potentially affected wildlife. Mitigation may include rehabilitation of areas infested with non-	General 2	Off-site mitigation would not be appropriate to consider in the absence of a proposal to disturb surface resources.

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	<p>native annual grasses and other invasive species with native plant species, conservation easements on private property, native seed bank funds, and the voluntary retirement of grazing allotments. The agencies should consider decommissioning and rehabilitating low-use, high-risk roads and routes throughout the project area as part of the mitigation package. The agencies and project proponent should investigate these options are part of this project analysis. If migratory species are being affected, another approach is to improve conservation efforts in other areas. Just as mitigation for salmon affected by dams includes protecting spawning habitat, energy development and transmission projects affecting migratory species could purchase conservation easements in other key habitats. We look forward to working with interested stakeholders to identify potential off-site mitigation areas and opportunities. Any discussion of mitigation measures must include some indication of the potential effectiveness of the measure. For example, the revegetation plan must include some analysis of the potential to establish viable native plant species that will remain viable on the landscape into the future. It is not sufficient to merely state that reseeding will occur, but that desired vegetation will be established and maintained. Given procedural and legal limitations on the use of voluntary applicant funds for off-site mitigation on public lands, we believe that in many cases it may be most productive to use mitigation funds for</p>		

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	<p>conservation measures on private land. For example, there may be significant opportunities to either purchase private lands to be placed in conservation easements within the vicinity of the project route or to enter into voluntary agreements with private landowners. In addition, mitigation funds could be used to rehabilitate habitat on private lands to promote wildlife reintroduction. Improperly managed domestic livestock grazing on public lands has been detrimental to both the health of wildlife habitat and water quality. Once the quality of the vegetation has been degraded significantly, natural rehabilitation can be difficult due to the natural aridity of this region. The potential exists to identify key habitat in the vicinity of the proposed leases and direct mitigation efforts there. The development of offsite mitigation should require input from interested private property owners, state and federal agencies, non-profit organizations and conservation groups. Although the complete restoration of the surrounding area is beyond the scope of this project, compensatory funds from this project could provide important seed money to start this initiative and build the necessary partnerships and momentum. This project's offsite mitigation program could also serve as a ready-made template for mitigating future energy development and transmission lines across Idaho, whether located on federal, state, or private land. In this manner, we can develop much-needed alternative energy infrastructure and</p>		

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	preserve our wildlife heritage. Any funds generated for off-site mitigation for wildlife must be accompanied by the stipulation that these funds are strictly used for the benefit of wildlife, fish, and the environment. Under no circumstance should these funds be available for other purposes. If additional measures are necessary to mitigate for local visual, community, economic or other non-wildlife concerns, funding for this mitigation should come from another source and not the percentage devoted to wildlife mitigation.		
3-13	Analysis is needed regarding sage-grouse use of the leasing area <i>as well as along potential transmission line routes</i> . While the Idaho Sage-Grouse Conservation Plan addresses sage-grouse conservation at the statewide scale, <i>site-specific</i> information is found in the documents drawn up by the Local Working Group. The Salmon-Challis Local Working Group has conducted sage-grouse telemetry in the region, and should be consulted to determine potential sage-grouse use for the project area and associated transmission construction. These data will be needed to determine appropriateness of geothermal siting, timing limitations, or required mitigation. The Sage-Grouse Monograph, published in late 2009, and the BLM's new sage-grouse Breeding Density maps contain further site-specific and species-specific information for making leasing siting decisions, creating leasing stipulations, and determining mitigation needs.	Wildlife 6	The Forest Service has conducted such an analysis and contacted the local working group.

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3-14	We recommend the use of stipulations similar to those applied to the Grand Mesa National Forest geothermal leases, included as Attachment A. There are site-specific differences, but most of the stipulations are applicable with relevant substitutions. For instance, the stipulations applied for Gunnison's Sage-Grouse in Colorado will be appropriate for Greater Sage-Grouse at the Salmon-Challis site.	Wildlife 6	Greater sage-grouse habitat does not occur in or near the project area (nearest mapped habitat is 10 miles from the nearest power corridor and 20 miles from the lease area, documented leks are farther). Acquisition of a lease does not exempt the holder from compliance with any laws and regulations applicable at the time of surface-disturbing operations.
3-15	<p>No Surface Occupancy (NSO)</p> <p>1. Riparian, Wetland and Floodplain Stipulation: The 100-year floodplains, wetlands, and riparian areas, and perennial stream courses are closed to any new permanent facilities. This stipulation may be waived, excepted or modified by the authorized officer if either the resource values change or the lessee/operator demonstrates that adverse impacts can be mitigated.</p> <p>2. Slopes: On slopes in excess of 40 percent and/or soils with high erosion potential.</p> <p>3. Wildlife: No surface occupancy would be allowed on areas inhabited by Southern Idaho ground squirrels. No populations are currently known within the lease area. Surveys for this species would be required before ground-disturbing activities could take place. The surveys would have to occur from March 15 to May 1, when the ground squirrels are active above ground.</p> <p>Timing Limitations (TL) and Controlled Surface Use (CSU)</p> <p>1. Water Resources: No surface disturbing</p>	General 6	The SCNF has utilized previous Forest Service leasing decisions, including that completed on the GMUG, to guide the development of lease stipulations for this project.

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	<p>activity would be allowed within 500 feet of water bodies, riparian areas, wetlands, and 100-year floodplains, or perennial streams, and within 100 feet of inner gorge of intermittent/ephemeral streams, unless site-specific analysis determines that no adverse impacts would occur. Riparian and wetland habitat includes the presence of riparian vegetation even without surface water being present, and all springs, even when seasonally non-flowing.</p> <p>2. Protection of erosive soils and soils on slopes between 30 and 40 percent: Best management practices would be required on a site by site basis to protect erosive soils defined as severe or very severe erosion classes based on Natural Resources Conservation Service (NRCS) mapping or slopes between 30 and 40 percent. The best management practices would include, but not be limited to stockpiling, mulching, seeding with BLM approved seed and monitoring the seeding for successful germination.</p>		
4-1	<p>The Department recommends no new surface disturbing activities be permitted from December 1 to April 15 to avoid potential effects to wintering big game species. Additionally, the Department recommends a stipulation that avoids or limits new surface disturbing activities on any slopes with southeast to southwest aspects or on slopes > than 50%. The Department recommends that no new surface activity occur within the project area from May 1 to June 30 to avoid potential effects to lambing bighorn sheep and</p>	Wildlife 6	USFS has adopted these recommendations for lease stipulations. Slope restrictions (NSO >40%) for geologic stability reasons cover big game winter habitat.

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	calving elk. The Department recommends additional stipulations be proposed so that ground disturbing activities do not occur in known or predicted winter range or lambing and calving areas.		
4-2	<p>Within the Project Area, the Department has records of Canada lynx, wolverine, and flammulated owl, all considered Idaho Species of Greatest Conservation Need (IDFG 2005). Potential effects to Canada lynx and wolverine populations should be reduced through recommended stipulations identified above for big game species. The Department recommends stipulations prohibiting the harvest of mature trees and maintaining snag and aspen habitats to help protect denning and forging areas. The Department recommends stipulations prohibiting ground disturbing activities near known or predicted flammulated owl nesting locations between May 1 and August 15 to avoid potential effects to flammulated owl breeding populations. Additionally, stipulations that prohibit motorized public access on new temporary roads related to ground disturbing activities should be proposed as additional protections for Species of Greatest Conservation Need. We recommend a stipulation that includes surveys for flammulated owl occurrences and nests which are undertaken by developers prior to any ground-disturbing activities. These methods and findings should be reviewed by Department staff prior to approval of the ground-disturbing activities... Fisher are</p>	Wildlife 6	USFS has adopted these recommendations for lease stipulations.

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	considered an Idaho Species of Greatest Conservation Need (IDFG 2005) and stipulations aimed at prohibiting new ground disturbing activities in snag and aspen habitats, as mentioned above, should be proposed.		
4-3	The Department has recently documented peregrine falcon between Bear Gulch and Squaw Gulch near an historic aerie approximately 2 miles from the Panther Creek confluence with the Salmon River. Given the adjacent location of this potential aerie to the Project Area the Department recommends proposing stipulations that prohibit ground disturbing activities and surface occupancy on slopes > 50% to avoid potential foraging habitats. We recommend a stipulation that includes surveys for peregrine falcon occurrences and nests which are undertaken by developers prior to any ground-disturbing activities. These methods and findings should be reviewed by Department staff prior to approval of the ground-disturbing activities.	Wildlife 6	USFS has adopted these recommendations for lease stipulations. Slope restrictions (NSO >40%) for geologic stability reasons cover peregrine foraging habitat.
4-4	Wild bird mortalities have been widely documented in hollow metal and PVC pipe structures, including mining claim markers. Cavity-nesting birds are especially vulnerable to these pipes and posts, which include outhouse vent pipes. Stipulations should require that any open vertical pipe associated with the project activity be capped or properly screened to prevent bird, reptile, amphibian, and small mammal mortalities.	Wildlife 6	USFS has adopted these recommendations for lease stipulations.
4-5	The Panther Creek drainage contains all life	Fisheries	USFS has adopted these recommendations for lease

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	<p>stages of cutthroat, bull, steelhead, redband, and rainbow trout and Chinook salmon. Bull trout, steelhead trout and Chinook salmon are protected under the Endangered Species Act (ESA). The Department recommends stipulations that include in-water work windows on Panther and Clear Creeks be limited between July 14 and August 14 to help avoid negative effects to the above mentioned species. To help protect fish habitat the Department recommends stipulations that employ Best Management Practice's (e.g. sediment control structures) when working in or near perennial and intermittent streams or when working on drainage slopes. Because of steep slopes and highly erodible soils within the Project Area stipulations should be designed to locate and design roads and drainage structures to prevent slope failure into waterways. Additionally, please require that, all facilities, including service and refueling areas, are built on benches upslope from streams, riparian areas, and floodplains. The Department recommends stipulations so that any stream crossings will be planned and constructed to minimize disturbance of the riparian and aquatic habitats by locating crossings at the most advantageous location and by crossing at or near the perpendicular of the stream. Stipulations for stream crossings need to allow year round upstream and downstream fish passage that maintains appropriate water velocity, water depth, height (drop) of structure, and natural stream bottom. Please require the use of natural stream</p>	6	stipulations.

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	simulation design (http://www.fs.fed.us/eng/pubs/pdf/StreamSimulation/index.shtml) for all stream crossings.		
4-6	The Project Area is used by hunters. The Department recommends proposing stipulations that maintains reasonable access to and throughout the Project Area during all hunting seasons.	Recreation 6	USFS has adopted these recommendations for lease stipulations.
4-7	Due to the sensitivity of the Project Area for fish and wildlife resources the Department requests the opportunity to review and provide additional comments on the draft recommended stipulations and other design features intended to protect fish and wildlife resources prior to submitting to the BLM.	NEPA 6	Multiple stipulations require consultation with IDFG for specifically proposed operations.
4-8	If a lease is granted, it is essential that the Forest re-scope any proposal with specifics, mitigations, and Best Management Practices for drilling and/or energy development permitting. Because the Department only considers this information request to provide lease stipulations to help protect fish and wildlife resources, we strongly urge all agencies involved to re-scope any specific proposal for drilling or geothermal development to help determine reasonable mitigation measures.	NEPA 6	Any future NEPA associated with these leases will be conducted by BLM, in cooperation with USFS. USFS will recommend that the appropriate level of NEPA analysis and attendant public involvement be conducted for any proposed surface-disturbing activities.
5-1	It is essential that an EIS be prepared to protect the extraordinary wild land, ESA listed fisheries, forested wildlife, recreational values including those associated with geothermal waters, and other very important values of Forest lands that are greatly threatened by this proposal, and all its direct, indirect, cumulative and linked impacts...	NEPA 3, 6	Geothermal leasing does not authorize any surface or subsurface disturbances. Therefore, it entails no direct effects. The EA will include an analysis of <i>potential</i> indirect effects of reasonably foreseeable geothermal development. However, given the uncertainty of such actions and effects, it would be inappropriate to prepare an EIS at the leasing stage.

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	We are alarmed at the incremental greatly segmented process by which "exploration" bleeds into full-blown development, and this lease issuance will underlie it all.		
5-2	This project may permanently alter and destroy underground aquifer waters and layers. It may deplete springs and spring flows great distances away from the lease/lease development sites. Full and detailed analysis of all changes in water flows, studies on aquifers, and full baseline information on springs over 00 mile radius must be collected. Wilderness waters may be depleted. BIM WSA waters may be depleted.	Watershed 2, 6	The project does not include any ground-disturbing activities. The project is designed (through the requirement of standard and site-specific lease stipulations) to prevent and/or minimize, to the extent possible under existing laws and regulations, impacts to surface and subsurface water quality and quantity, should ground-disturbing operation be proposed. Acquisition of a lease does not exempt the holder from compliance with any laws and regulations applicable at the time of surface-disturbing operations.
5-3	Bull trout, salmon-steelhead, rare frog and other waters may be depleted... All logging, "treatment", roading, mine, grazing and otter disturbance across this landscape must also be critically examined. This all combined will impact native terrestrial and aquatic species, and lead to losses in habitat and populations.	Fisheries Wildlife 2, 6	The project does not include any ground-disturbing activities. The project is designed (through the requirement of standard and site-specific lease stipulations) to prevent and/or minimize, to the extent possible under existing laws and regulations, effects on aquatic, terrestrial and botanical species. Acquisition of a lease does not exempt the holder from compliance with any laws and regulations applicable at the time of surface-disturbing operations.
5-4	All of these impacts will be amplified by the adverse impacts of climate change.	All Resources 2	The project does not include any ground-disturbing activities. The potential indirect effects of any reasonably foreseeable lease developments would render it insignificant in relation to climate change. Direct and other effects of actual ground-disturbances would be considered should they be proposed.
5-5	Any exploration must be done without any surface disturbance, cross country travel, or roads.	Minerals 2, 3, 5, 6	The project does not include exploration or any other ground-disturbing activities. Site specific lease stipulations preclude and/or limit surface disturbances and vehicle travel, as appropriate under higher level decisions, including the BLM PEIS for leasing in the western U.S. and the Salmon Forest Plan.

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5-6	The Forest must deny this request. These lands are not capable or suitable of supporting it. The Forest should begin a process to withdraw these lands from leasing.	NEPA Minerals 2, 3, 5	The scope of the proposed action was defined when BLM requested USFS consent to lease, within the constraints of the Forest Plan and Programmatic EIS, both of which acknowledged the geothermal potential of the area. Therefore, a mineral withdrawal is not within the scope of the analysis.
6-1	Land leasing is not within the purview of IDWR. However geothermal exploration and development drilling will require permitting through IDWR and must be done on a manner that is protective of groundwater and geothermal resources in the area.	Watershed 3, 6	The Forest included stipulations tiered to State laws regarding the protection of groundwater and geothermal resources.
7-1	Based on the information provided, it appears that the proposed leasing area contains streams and wetlands subject to our jurisdiction. If any future development projects will involve the discharge of dredged or fill material in waters of the United States, including wetlands, a Department of Army permit may be required prior to the start of construction	Watershed 3, 6	The Forest included a lease notice informing the applicant of the requirement to comply with all applicable laws (including CWA section 404).

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